

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA, ET AL.,

Plaintiffs,

v.

JETBLUE AIRWAYS CORPORATION, ET AL.,

Defendants.

Civil Action No. 1:23-cv-10511-WGY

GABRIEL GARAVANIAN, ET AL.,

Plaintiffs,

v.

Civil Action No. 1:23-cv-10678-WGY

JETBLUE AIRWAYS CORPORATION, ET AL.

Defendants.

**SOUTHWEST AIRLINES CO.'S  
MOTION FOR LEAVE TO INTERVENE FOR A LIMITED PURPOSE**

Pursuant to Fed. R. Civ. P. 24 and Local Rule 7.1, Southwest Airlines Co. (“Southwest”) respectfully moves for leave to intervene as of right under Rule 24(a)(2), or, alternatively, permissively under Rule 24(b) in the above-captioned case, for the limited purpose of protecting the confidentiality of Southwest documents, including for the purpose of filing Objections as called for by paragraph 25 of the [Proposed] Stipulated Joint Protective Order and Order

Governing Production of Investigation Materials. *See United States et al. v. JetBlue Airways Corp., et al.*, No. 23-cv-10511 (WGY) (“the Government Action”), Dkt # 97 & 97-1 (“the Proposed Order”).

The basis for this Motion is set forth in the accompanying Memorandum in Support of Southwest Airlines Co.’s Motion to Intervene for a Limited Purpose.

**REQUEST FOR ORAL ARGUMENT**

Following a meet and confer with counsel for all parties pursuant to Local Rule 7.1, no party has objected to Southwest filing this motion for leave to intervene for a limited purpose. However, substantial disputes remain about the document confidentiality issues raised by the Proposed Order. Southwest believes that an oral argument may assist the Court and, therefore, respectfully requests a hearing pursuant to Local Rule 7.1(d).

WHEREFORE, Southwest respectfully requests that the Court permit Southwest to intervene in this matter for the limited purpose of protecting the confidentiality of its documents.

Dated: June 5, 2023

Respectfully submitted,

*/s/ William H. Stallings*  
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**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1**

I HEREBY CERTIFY that in accordance with Local Rule 7.1, counsel for Southwest has conferred with counsel for Plaintiffs and Defendants in both the Government Action and the Private Action (*Garavanian et al. v. JetBlue Airways Corp. et al.*, 1:23-cv-10678), including Elizabeth Wright (counsel for JetBlue), Edward Duffy (counsel for the United States) and Joseph M. Alioto, Jr. (counsel for Private Action plaintiffs). In addition to attendance by these counsel, the meet and confer session on June 2, 2022, was made known in advance to all counsel of record in both actions and attended by multiple attorneys representing parties in both actions.

/s/ William H. Stallings  
William H. Stallings

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on June 5, 2023.

/s/ William H. Stallings  
William H. Stallings